

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-10106JLT

ZHANNA CHIZHIK,)
Administratrix of the Estate)
of Grigory Chizhik,)
Plaintiff)
)
v.)
)
SEA HUNT BOATS, INC.,)
TROPICLAND)
MARINE AND TACKLE, INC.,)
and GREGORY ZILBERMAN,)
Defendants.)
_____)

**DEFENDANT, SEA HUNT BOATS, INC.'S MOTION TO EXTEND
TIME TO RESPOND TO COMPLAINT (ASSENTED TO)**


Defendant Sea Hunt Boats, Inc. hereby respectfully moves the Court to extend its time to respond to the Plaintiff's Complaint through and including March 10, 2004. As grounds for this motion, the Defendant states that its attorney has only recently received the Complaint and requires additional time to prepare the Defendant's response.

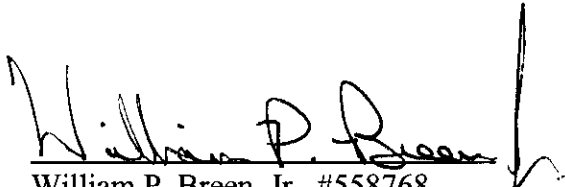
In further support of this motion, the undersigned attorney states that he has discussed this motion with counsel for the Plaintiff and has determined that Plaintiff's counsel assents to this motion. This is the Defendant's first request for extension of time with the respect to the present deadline.

WHEREFORE, the Defendant moves the Court to extend its time to respond to the Plaintiff's Complaint through and including March 10, 2004.

The Plaintiff,
ZHANNA CHIZHIK
Administratrix of the Estate
Grigory Chizhik,
By her attorneys,

The Defendant,
SEA HUNT BOATS, INC.
By their attorneys,

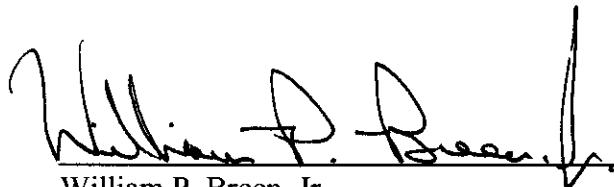

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Dated: February 18, 2004

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

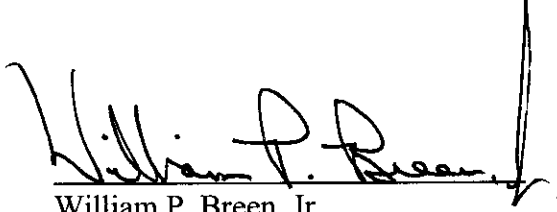
The undersigned attorney certifies that prior to filing the above motion, he conferred in good faith with Attorney Timothy Barouch, who represents the Plaintiff, to narrow the issues raised by this motion. The undersigned attorney has determined that opposing counsel assents to the present motion.


William P. Breen, Jr.

CERTIFICATION OF SERVICE

The undersigned attorney hereby certifies that on this 18th day of February, 2004, he served a copy of the foregoing document, via first class mail, upon the following:

David B. Kaplan, Esq.
Timothy M. Barouch, Esq.
The Kaplan/Bond Group
Boston Fish Pier
West Building, Suite 304
Boston, MA 02210


William P. Breen, Jr.